

REMARKS

Claims 1-20 are all the claims pending in the application.

Claim Rejections - 35 U.S.C. § 102(b) - Fernandez (1998)

The Examiner rejected claims 1-3, 5-7 and 20 under § 102(b) as being anticipated by Fernandez (1998). Applicants traverse this rejection as follows.

First, Applicants incorporate the arguments set forth in the Amendment filed November 21, 2006. Second, Applicants respectfully submit that Fernandez fails to disclose wherein the media file management unit is implemented in a single program application, as recited in claim 1.

Fernandez is a book discussing different components available with the Windows Operating system or downloadable as shareware. In making this rejection of claim 1, the Examiner combines portions of the Jet-Audio shareware (*citing* pg. 32-34, Figures 2-11 and 2-12) with: (1) a separate Windows find function (*citing* pg. 66-68, Figure 4-18); and (2) Cool Edit 96 for Windows, another software component that permits the converting of sound filed from one format to another. (*citing* pg. 263-270)

Because these different components are each independent program applications running under windows, even if the different embodiments could be combined as systems, Applicants submit that Fernandez fails to disclose wherein they are embodied in a single program application. Rather, to the contrary, these are independent Windows program applications.

Thus, because Fernandez fails to disclose all the features recited in claim 1, Applicants submit that claim 1 is allowable. Additionally, Applicants submit that claims 2-11 are allowable, at least because of their dependency.

Furthermore, because claims 12 and 20 recite features similar to those set forth above with regard to claim 1, Applicants submit that claims 12 and 20 are allowable for the same reasons set forth above. Additionally, Applicants submit that claims 13-19 are allowable, at least because of their dependency from claim 12.

Claim Rejections - 35 U.S.C. § 102(a) - Rodriguez et al.

The Examiner rejected claims 1-6, 8-10, 12-16 and 18 as being anticipated by Rodriguez et al. (2003/0005454; Rodriguez). Applicants traverse this rejection as follows.

Claim 1 recites, *inter alia*, a display driving unit that displays the search window and the edit window together in a single display screen.

First, Applicants incorporate the arguments submitted in the Amendment filed November 21, 2006. Second, Applicants submit that the Examiner's reading of the input window of FIG. 14 is not reasonable.

In the Advisory Action of December 6, 2006, the Examiner states:

[T]he limitation of "edit" has been attributed with the customary and ordinary meaning of "to modify or add to data or text." Therefore, the disclosure of Rodriguez cited in the previous Office Action reasonably supports that the claimed invention is anticipated by said cited prior art. For example, Applicants pointed to Figure 14 in Rodriguez [which] describes a "search screen" wherein said search screen comprises a window 1424 that enables the user to enter alphanumeric characters . . . name of title, or any of the PRM information and the result display . . . will display the information.

(Advisory Action, p. 2).

Thus, the Examiner is now reading the Search window 1424 of Rodriguez to be both a search window and an edit window. In contrast to the Examiner's interpretation of "edit", Applicants submit that this is not the customary and ordinary meaning of the term "edit window." In fact, Rodriguez implies a different meaning, i.e. an edit screen 1200 which enables a user to enter and/or edit certain personal annotations such as the media content category, date recorded, etc. Accordingly, interpreting the mere inputting of text into a search window does not even comply with the meaning of an edit screen as disclosed by the reference applied by the Examiner. Moreover, the first initial inputting of text is not customarily referred to as an edit. Only after text has been inputted and, then, subsequently modified, has the text been edited. Furthermore, no portion of Rodriguez indicates that any data typed into the search window 1424 is ever used to modify or add to any text or data. Therefore, Applicants submit that the search window 1424 does not correspond to an edit window.

Furthermore, assuming, *arguendo*, that the search window 1424 could be construed as an edit window, Rodriguez only would disclose a single search/edit window being displayed in a single screen. In contrast, claim 1 requires that a search window and an edit window be displayed in a single screen. To the contrary, even the Examiner's overly broad reading of Rodriguez fails to disclose both a search window and an edit window being displayed at the same time. To the extent that the search window 1424 may be construed as an edit window, only one window is displayed by Rodriguez. Therefore Rodriguez fails to disclose all the features recited in claim 1.

Thus, Applicants submit that claim 1 is allowable for at least the reasons set forth above. Additionally, Applicants submit that claims 2-6 and 8-10 are allowable, at least because of their

dependency. Because claim 12 recites features similar to those set forth above with regard to claim 1, Applicants submit that claim 12 is allowable for the same reasons set forth above. Further, Applicants submit that claims 13-16 and 18 are allowable, at least because of their dependency.

Claim Rejections - 35 U.S.C. § 103(a)

The Examiner rejected claims 7, 11, 17, 19 and 20 under § 103(a) as being unpatentable over Rodriguez as applied to claims 1-6, 8-10, 12-16 and 18 and in further view of Fernandez.

Applicants respectfully submit that because both of these references are deficient for at least the same reasons as set forth in our proposed arguments above, that neither Rodriguez nor Fernandez, either alone or in combination, teach or suggest, at least the features recited in independent claims 1, 12 and 20, namely, displaying both an edit window and a search window together in a single display screen. Thus, Applicants submit that claim 20 is allowable for at least this reason. Additionally, Applicants submit that claims 7, 11, 17 and 19 are allowable, at least because of their dependency.

Conclusion

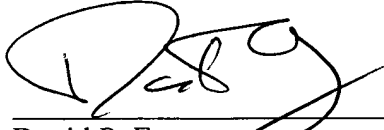
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Amendment Under 37 C.F.R. § 1.114(c)
U.S. Appln. No. 10/647,300

Atty. Dkt. No. Q76059

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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CUSTOMER NUMBER

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